

EDWARDS & JENNINGS  
PROFESSIONAL CORPORATION  
ATTORNEYS AND COUNSELORS  
65 CADILLAC SQUARE  
CADILLAC TOWER BUILDING  
SUITE 2710  
DETROIT, MICHIGAN 48226-2878  
—  
(313) 961-5000  
FACSIMILE (313) 961-9165

June 19, 2012

June Adams, Esq.  
City of Detroit Law Department  
660 Woodward Avenue, Suite 1650  
Detroit, MI 48226

Re: Pamela Willis Turner v City of Detroit  
Case No.: 11-cv-12961-JAC-MAR

Dear Ms. Adams:

Enclosed find Plaintiff's Second Notice of Taking Deposition Duces Tecum of Mayor Dave Bing, together with Certificate of Service regarding the above captioned matter.

Thank you for your attention in this regard.

Sincerely,

  
Alice B. Jennings

ABJ/cdc

Encls.

cc(w/encls): Felicia Duncan Brock, Esq.  
Bienenstock Court Reporting

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

PAMELA WILLIS TURNER,

Plaintiff,

vs.

Case No.: 11-cv-12961-JAC-MAR  
Honorable Julian Abele Cook  
Magistrate Judge Mark A. Randon

CITY OF DETROIT,

Defendant.

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**PLAINTIFF'S SECOND NOTICE OF TAKING DEPOSITION DUCES TECUM**

To: June Adams, Esq.  
Bienenstock Court Reporting

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45, Plaintiff, Pamela W. Turner, by her counselors, Edwards & Jennings, P.C., by Alice B. Jennings, and I.A.B. Attorneys at Law, PLLC, by Felicia Duncan Brock shall take the deposition of **MAYOR DAVE BING** on Tuesday, July 31, 2012 beginning at 10:00 a.m., at the law offices of Edwards & Jennings, P.C., 65 Cadillac Square, Cadillac Tower Building, Suite, 2710, Detroit, Michigan 48226.

The deposition shall continue from day to day until concluded, within the parameters of Rule 30, and shall be recorded by stenographic means.

**THE DEPONENT IS DIRECTED TO PRODUCE THE FOLLOWING DOCUMENTS:**

1. Any and all of Defendant, City of Detroit's documents regarding Plaintiff's appointment by Mayor Dave Bing as Director of the Water and Sewage Department.
2. Any and all documents regarding Plaintiff Turner's pay as the Director of the Water and Sewage Department.



3. Any and all of Defendant, City of Detroit's documents showing salary payments of former Director of the City of Detroit, Water and Sewage Department, Victor Marcado, from his date of hire until his last day of work.

4. Any and all of Defendant, City of Detroit's documents showing salary payments of former Director of the City of Detroit, Water and Sewage Department, Anthony Adams, from his date of hire until his last day of work.

5. Any and all of Defendant, City of Detroit's documents regarding its hiring of contractor to search for a Director of the City of Detroit's Water and Sewage Department from January 1, 2001 until present.

6. Any and all handwritten or computer generated notes, summarizing your discussions with Plaintiff, Pamela Turner regarding her pay as the Director of Defendant, City of Detroit's Water and Sewage Department.

7. Any and all of Defendant, City of Detroit discipline, if any, received by Plaintiff, Pamela Turner from her time of hire until her last day of work.

8. Defendant's white book for Director of the Water and Sewage Department from January 1, 2001 to present.

9. Any and all of Defendant's selection documents, emails, offers and salary contracts for the appointment of Sue McCormick for the position of Director of the City of Detroit, Water and Sewage Department.

10. Any and all posting or advertisements for the position of the Defendant, City of Detroit, Water and Sewage Department.

EDWARDS & JENNINGS, P.C.

By: 

Alice B. Jennings (P29064)  
Attorney for Plaintiff  
65 Cadillac Square, Suite 2710  
Detroit, Michigan 48226  
(313) 961-5000  
[ajennings@edwardsjennings.com](mailto:ajennings@edwardsjennings.com)

Dated: June 19, 2012

**CERTIFICATE OF SERVICE**

I, certify that a copy of Plaintiff's Renotice of Taking Deposition Duces Tecum was served upon the attorneys of record of all parties to the above cause via first class mail on June 19, 2012.



C. Clay